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July 13, 2023

VIA ECF

The Honorable Katharine H. Parker
United States Magistrate Judge
United States District Court, Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

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Re: Kaplan, et al. v. Lebanese Canadian Bank, SAL, 08-CV-7253 (GBD)(KHP), Lelchook, et al. v. Lebanese Canadian Bank, SAL, et al., 18-CV-12401 (GBD)(KHP)

Dear Judge Parker:

We write on behalf of all parties in the above-referenced actions to request that the Court so-order the Stipulation and [Proposed] Order Staying Discovery filed herewith, for the reasons set forth therein.

Additionally, should the Court so-order the Stipulation and [Proposed] Order, which will have the effect of staying all discovery in these actions until 60 days after the Second Circuit issues its mandate in the Plaintiffs' pending appeal in *Lelchook v. SGBL*, No. 21-975 (2d Cir.), the parties also jointly request that the case management conference in these matters currently scheduled for July 20, 2023 be adjourned *sine die*.

We thank the Court for its attention to these matters.

The Honorable Katharine H. Parker United States District Court, Southern District of New York July 13, 2023

Respectfully submitted,

Squire Patton Boggs (US) LLP

<u>/s/ Gassan A. Baloul</u> Gassan A. Baloul

SO ORDERED.

Dated: New York, New York July ___, 2023

Hon. Katharine H. Parker

APPLICATION GRANTED

Hon. Katharine H. Parker, U.S.M.J. 7/14/2023

The parties shall write a joint status letter within three days of the New York Court of Appeals' answer to the Second Circuit's certified question.